

1 William R. Hopkins, State Bar #170122
2 LAW OFFICE WILLIAM R HOPKINS
3 1 Blackfield Drive, Suite 344
4 Tiburon, CA 94920
5 Telephone: (415) 691-8686
6 Facsimile: (415) 373-3761
7 E-Mail: wrhopkins3@prodigy.net

5 Attorneys for Plaintiff
6 LaVERNON TITUS

7 DENNIS J. HERRERA, State Bar #139669
8 City Attorney
9 CHERYL ADAMS, State Bar #164194
10 Chief Trial Deputy
11 ELIZABETH PEDERSON, State Bar #288184
12 Deputy City Attorney
Fox Plaza
1390 Market Street, 6th Floor
San Francisco, California 94102-5408
Telephone: (415) 554-3862
Facsimile: (415) 554-3837
E-Mail: elizabeth.pederson@sfgov.org

13 Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO,
14 OFFICER ANDREW JOHNSON AND
CAPTAIN ERIC VINTERO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

18 LaVERNON TITUS,
19 Plaintiff,
20 vs.
21 City and County of San Francisco, a municipal
corporation; Police Officer Start No. 700,
Police Officer, Badge no. 161, San Francisco
Police Department, in their individual and
official capacities and DOES 1 –through 20,
inclusive,
24 Defendants

Case No. C13-02401 JST

**STIPULATION RE PLAINTIFF'S MOTION
TO FILE AMENDED COMPLAINT (Dkt. Nos.
32-34); [PROPOSED] ORDER**

This matter is presently set on September 25, 2014 for hearing on Plaintiff's motion to file an amended complaint (Dkt. Nos. 32-34). Defendants opposed this motion on the grounds of prejudice due to the possibility of re-opening discovery. (Dkt. No. 37.)

The parties have met and conferred and agreed to the following:

Defendants agree to withdraw their objection to the filing of Plaintiff's Amended Complaint as presented as an attachment to Plaintiff's motion (Dkt. No. 34-1).

Plaintiff agrees not to seek to reopen either fact or expert discovery in this case.

Both parties agree that the filing of the amended complaint (Dkt. No. 34-1) will not affect the deadlines set by Judge Tigar in his scheduling order (Dkt. No. 23).

SO STIPULATED.

Dated: August 25, 2014

LAW OFFICE WILLIAM R HOPKINS

By: _____
WILLIAM R. HOPKINS

Attorneys for Plaintiff
LaVERNON TITUS

Dated: August 25, 2014

DENNIS J. HERRERA
City Attorney
CHERYL ADAMS
Chief Trial Deputy
ELIZABETH PEDERSON
Deputy City Attorney

By: _____
ELIZABETH PEDERSON

Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO,
OFFICER ANDREW JOHNSON AND
CAPTAIN ERIC VINTERO

1
2 [PROPOSED] ORDER
3

4 PURSUANT TO STIPULATION, IT IS SO ORDERED.
5

6 The Court grants leave to Plaintiff to file his amended complaint (Dkt. No. 34-1) by August 29,
7 2014. Defendants shall answer such amended complaint by September 2, 2014. All dates in the
8 original scheduling order (Dkt. No. 23) will remain in place. Fact and expert discovery will remain
9 closed.

10 DATED: August 26, 2014
11

